

Exhibit C

EXHIBIT 8

EXHIBIT FILED UNDER SEAL

Greg Brown Confidential

July 15, 2025

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CONFIDENTIAL

VIDEOTAPED 30(b)(6) DEPOSITION OF
UBER TECHNOLOGIES, INC.,
RASIER, LLC, and RASIER-CA, LLC
GREG BROWN

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT LITIGATION

MDL No. 3084 CRB

DEPONENT: GREG BROWN
DATE: July 15, 2025
TIME: 9:43 a.m.
LOCATION: NELSON MULLINS
CHARLESTON, SC
REPORTED BY: JESSICA BOLANOS

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1 A. I understand you want a yes/no answer, I
2 think it just merits a bit more context around
3 that --

4 Q. Why can't --

5 A. -- particular circumstance.

6 Q. Sorry. Why can't you answer that with a
7 yes?

8 A. I don't think I can speak for the
9 expectations of all users on the platform.

10 Q. With respect to the topic that you're
11 designated on, which is Uber's training of
12 Mr. Turay, did Uber tell Mr. Turay that he would
13 be trusted by riders not to take advantage of
14 them sexually?

15 A. Yeah, my understanding is that would
16 have been conveyed in the community guidelines
17 that I believe would have been furnished to him.

18 Q. You believe the community guidelines
19 explain the reason behind the no-sex rule or the
20 no-contact rule, that it's because of that trust
21 that riders have in drivers?

22 A. I -- I don't know whether the community
23 guidelines opine upon the reason as you
24 mentioned.

25 Q. Do they -- did Uber ever communicate to

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1 Mr. Turay that when he transports people who are
2 intoxicated, that they may be less able to
3 respond to voice their nonconsent, they may be
4 too scared, they may be too surprised to run,
5 scream, or say something? Did they teach him
6 that?

7 A. I would have to re-review the
8 educational content to be able to answer
9 confidently as to whether or not that specific
10 phrasing or circumstantial scenario was opined
11 upon, but I'm not sure whether or not the
12 educational content specifically would have
13 included that type of language.

14 Q. As you sit here today as the person
15 speaking for Uber about its training of
16 Mr. Turay, you can't point the jury to a specific
17 communication where Mr. Turay said -- where Uber
18 said to Mr. Turay that intoxicated riders may not
19 be able to voice their nonconsent; is that
20 correct?

21 A. As I mentioned, they're -- I would have
22 to re-review the content available in the
23 Learning Center for Mr. Turay.

24 Q. Right. But my question is: As you sit
25 here today as the person speaking for Uber about

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1 its training of Mr. Turay, you can't at this time
2 point to a specific communication where Mr. -- or
3 Uber said to Mr. Turay that intoxicated riders
4 might not be able to voice their nonconsent; is
5 that correct?

6 A. Yeah, as I sit here, I -- I'm not sure.

7 Q. You can't, right?

8 A. I can't.

9 Q. What did Uber do when it onboarded
10 Mr. Turay to make sure that he understood and
11 appreciated the no-sex, no-contact rule in the
12 community guidelines?

13 A. As I mentioned, in the course of
14 preparation, I understand that over time Uber
15 would have sent via email links to those
16 community guidelines, et cetera. I believe circa
17 2021, Uber would have rolled out an affirmative
18 assent process or confirmation process associated
19 with its community guidelines as a mechanism to
20 help build better awareness, which I believe also
21 would have included the, I think as you said,
22 no-sex rule on Uber.

23 MS. PETERS: Let's go ahead and
24 mark Tab 116 as Exhibit 1680.

25

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1 the nature of it.

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 Q. So here we have a line in the data from

12 [REDACTED]

13 [REDACTED]

14 And if you look at the date and time, it's

15 11-15-23 at 12:38 a.m. So that's during the

16 subject trip, right?

17 A. Yeah, that's my understanding.

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 Q. Is it possible that Uber actually is in

24 possession of audio-recording of the subject trip

25 up until the point that the driver pushed the

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1 button to end the trip?

2 MS. LEVY: Object to form and
3 foundation. You can answer.

4 A. I'm not sure.

5 MS. LEVY: I will state for the
6 record this is the question you specifically
7 asked us to look into, and we are looking into
8 it.

9 MS. PETERS: Okay. I'm putting it
10 on my follow-up list.

11 MS. LEVY: Great.

12 MS. PETERS: Continued follow-up.

13 Q. And just because you're the person
14 officially speaking for Uber on investigations,
15 have you looked to see whether there is any
16 audio-recording data?

17 A. I have not.

18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]